

ORIGINAL

FILED
DISTRICT COURT OF GUAM

SEP - 1 2005 *jd*

MARY L.M. MORAN
CLERK OF COURT

1 LEONARDO M. RAPADAS
United States Attorney
2 MARIVIC P. DAVID
Assistant U.S. Attorney
3 Sirena Plaza Suite 500
108 Hernan Cortez Avenue
4 Hagatna, Guam 96910
Telephone: (671) 472-7332
5 Telecopier: (671) 472-7334
Attorneys for United States of America

6
7 **IN THE UNITED STATES DISTRICT COURT**
8 **FOR THE DISTRICT OF GUAM**

9 UNITED STATES OF AMERICA,) CRIMINAL CASE NO. 04-00048
10)
Plaintiff,)
11)
vs.) **GOVERNMENT'S MOTION**
12) **FOR A DOWNWARD DEPARTURE**
13) **UNDER USSG § 5K1.1 AND**
14) **18 U.S.C. § 3553(e)**
15)

13 JOANNAMARIE ALEJO TEJADA,
14)
Defendant.)
15)

16 Comes now the United States and moves, pursuant to USSG § 5K1.1 and 18 U.S.C.
17 § 3553(e), for a downward departure from the applicable total offense level to Level 17
18 which will yield an advisory guideline range of 24 to 30 months with Criminal History Category I.
19 The government intends to recommend the minimum term under said range, and the reasons for such
20 recommendation are set forth in a memorandum, which the government is seeking to lodge under
21 seal for reasons of security.

22 RESPECTFULLY SUBMITTED this 1st day of September 2005.

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24 LEONARDO M. RAPADAS
United States Attorney
Districts of Guam and CNMI

25
26 By: 

27 MARIVIC P. DAVID
Assistant U.S. Attorney
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